

**GIS REGISTRY INFORMATION**

**SITE NAME:** Wisconsin Central Limited Property

**BRRTS #:** 02-71-543574 **FID # (if appropriate):** \_\_\_\_\_

**COMMERCE # (if appropriate):** \_\_\_\_\_

**CLOSURE DATE:** 06/26/2007

**STREET ADDRESS:** Adjacent to 312 First St.

**CITY:** Neenah

**SOURCE PROPERTY GPS COORDINATES** (meters in WTM91 projection): X= 643416 Y= 414297

**CONTAMINATED MEDIA:** Groundwater  Soil  Both

**OFF-SOURCE GW CONTAMINATION >ES:**  Yes  No

**IF YES, STREET ADDRESS 1:** \_\_\_\_\_

**GPS COORDINATES** (meters in WTM91 projection): X= \_\_\_\_\_ Y= \_\_\_\_\_

**OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL):**  Yes  No

**IF YES, STREET ADDRESS 1:** \_\_\_\_\_

**GPS COORDINATES** (meters in WTM91 projection): X= \_\_\_\_\_ Y= \_\_\_\_\_

**CONTAMINATION IN RIGHT OF WAY:**  Yes  No

**DOCUMENTS NEEDED:**

- Closure Letter, and any conditional closure letter or denial letter issued x
- Copy of any maintenance plan referenced in the final closure letter. x
- Copy of (soil or land use) deed notice *if any required as a condition of closure* na
- Copy of most recent deed, including legal description, for all affected properties x
- Certified survey map or relevant portion of the recorded plat map (*if referenced in the legal description*) for all affected properties na
- County Parcel ID number, *if used for county*, for all affected properties na
- Railroad property na
- Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site. x
- Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs. x
- Tables of Latest Groundwater Analytical Results (no shading or cross-hatching) na
- Tables of Latest Soil Analytical Results (no shading or cross-hatching) x
- Isoconcentration map(s), *if required for site investigation (SI)* (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map. x
- GW: Table of water level elevations, with sampling dates, and free product noted if present na
- GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees) na
- SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour (\*above industrial stds) x
- Geologic cross-sections, *if required for SI.* (8.5x14" if paper copy) na
- RP certified statement that legal descriptions are complete and accurate na
- Copies of off-source notification letters (if applicable) na
- Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW) na



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Scott Hassett, Secretary  
Ronald W. Kazmierczak, Regional Director

Oshkosh Service Center  
625 E. CTY Y, Suite 700  
Oshkosh, Wisconsin 54901-9731  
Telephone 920-424-3050  
FAX 920-424-4404

June 26, 2007

Wisconsin Central, Ltd.  
ATTEN: Kurt Blumer  
17641 South Ashland Ave  
Homewood, IL 60430

Subject: **Final Case Closure with Land Use Limitations or Conditions**  
Wisconsin Central, Limited Property (Contract Lease Mfg. Lease Site),  
Adjacent to 312 First Street, Neenah, Wisconsin  
WDNR BRRTS Activity # 02-71-543574

Dear Mr. Blumer:

On February 6, 2007, the Northeast Regional Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On February 12, 2007, you were notified that the Closure Committee had granted conditional closure to this case.

On June 21, 2007 the Department received correspondence indicating that you have complied with the requirements of closure. The cap maintenance plan and monitoring well abandonment form have been received.

Based on the correspondence and data provided, it appears that your case meets the requirements of ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time.

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. It is the Department's intent to conduct inspections in the future to ensure that the conditions included in this letter including compliance with referenced maintenance plans are met.

Pursuant to s. 292.12(2)(a), Wis. Stats., the gravel cover that currently exists in the location shown on the attached map entitled, "Direct Contact Barrier Location," shall be maintained in compliance with the attached "Soil Performance Standard Maintenance Agreement" in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific locations described above is excavated in the future, the

property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

The following activities are prohibited on any portion of the property where gravel cover is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit <http://dnr.wi.gov/org/aw/rr/gis/index.htm>.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Casey Jones at 920-303-5424.

Sincerely,



Bruce G. Urban  
Northeast Region Remediation & Redevelopment Team Supervisor

Enclosure: Cap plan & map

Electronic copies: Andrew Mott, STS Consultants  
Jennifer Borski, WDNR Project Manager

**Soil Performance Standard [NR 724.02(1)]**  
**Maintenance Agreement**

**Description:**

The soil performance standard selected is use of existing granular (gravel) cover to provide a barrier to direct contact with soil. Ground cover created by the existing granular cover will prevent disturbance and air suspension of soil particles, thereby preventing direct contact.

**Maintenance Plan [NR 724.13(2)]:**

As a condition of closure, a granular cap has been identified as an institutional control to address residual PAH concentrations in soils identified on the Wisconsin Central Ltd. (WC) parcel as shown on the attached figure.

In accordance with Chapter NR 724.13(2), Wisconsin Administrative Code, WC will inspect the granular cap in accordance with this maintenance plan.

Written records of inspections will be maintained by WC. The inspections will consist of visual observations to confirm the following:

- The general integrity of the ground cover provided by the existing granular material.
- No filling or digging has occurred.

Deficiencies in the cap will be documented and addressed within one month of discovery.

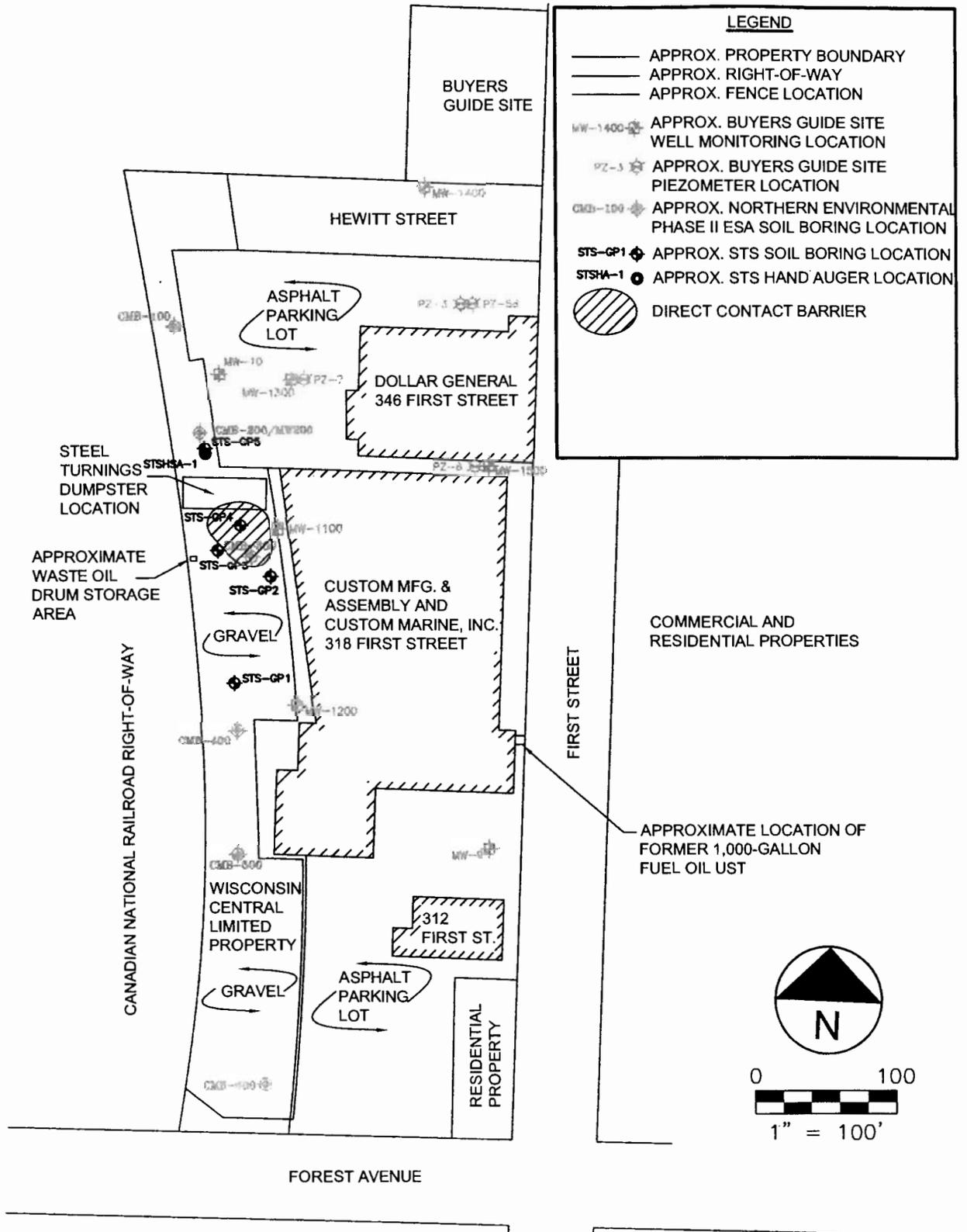
The existing cover will be inspected according to the following schedule:

- Once annually during the month of September or October.

In addition, the Wisconsin Department of Natural Resources (WDNR) should be notified prior to conducting any of the following activities:

- Digging or filling within the institutional control area.
- Construction or installation of a building or other structure with a foundation that would be located within the institutional control area.

X:\Projects\200603521\dwg\g200603521-002.dwg: 6/21/2007 12:47:39 PM; MOTT, ANDREW G.



**STS CONSULTANTS**  
558 North Main Street  
Oshkosh, WI 54901  
920-235-0270  
www.stsconsultants.com  
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**DIRECT CONTACT BARRIER LOCATION  
CONTRACT MANUFACTURING LEASE SITE  
312 FIRST STREET  
NEENAH, WISCONSIN**

Drawn :	CSW 07/31/2006
Checked:	AGM 07/31/2006
Approved:	DRL 5/22/2007
PROJECT NUMBER	200603521
FIGURE NUMBER	1



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Scott Hassett, Secretary  
Ronald W. Kazmierczak, Regional Director

Oshkosh Service Center  
625 E. CTY Y, Suite 700  
Oshkosh, Wisconsin 54901-9731  
Telephone 920-424-3050  
FAX 920-424-4404

February 12, 2007

Wisconsin Central, Ltd.  
ATTEN: Kurt Blumer  
17641 South Ashland Ave  
Homewood, IL 60430

Subject: **Conditional Closure Decision With Requirements to Achieve Final Closure**  
Wisconsin Central, Limited Property (Contract Lease Mfg. Lease Site),  
Adjacent to 312 First Street, Neenah, Wisconsin  
WDNR BRRTS Activity # 02-71-543574

Dear Mr. Blumer:

On February 7, 2006, the Northeast Regional Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Closure Committee has determined that the polycyclic aromatic hydrocarbon (PAH) and metals contamination from historic fill material on the site appears to have been investigated and remediated to the extent practicable under site conditions. The petroleum in groundwater monitoring well CMB-200/MW200 is from an offsite source. Your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied:

### **MAINTENANCE PLAN**

To close this site, the Department requires that the existing gravel cover at the site must be maintained for protection from direct contact soils. The cover is to be maintained in accordance with a plan prepared and submitted to the Department pursuant to s. NR 724.13(2), Wis. Adm. Code. Please have your consultant submit a cap maintenance plan and map as well as photos to confirm existing gravel cap.

### **MONITORING WELL ABANDONMENT**

The monitoring wells at the site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to Casey Jones on Form 3300-5B found at [www.dnr.state.wi.us/org/water/dwg/gw/](http://www.dnr.state.wi.us/org/water/dwg/gw/) or provided by the Department of Natural Resources.

### **PURGE WATER, WASTE AND SOIL PILE REMOVAL**

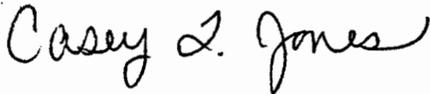
Any remaining purge water, waste and/or soil piles generated as part of site investigation or remediation activities must be removed from the site and disposed of or treated in accordance with Department of Natural Resources' rules. Once that work is completed, please send appropriate documentation regarding the treatment or disposal of the remaining purge water, waste and/or soil piles.

When the above conditions have been satisfied, please submit the appropriate documentation (for example, well abandonment forms, disposal receipts, photos, etc.) to verify that applicable conditions have been met, and your case will be closed. Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites for soil contamination remaining at sample locations: CMB-100, CMB-300, CMB-500, CMB-600, STS-GP2, STS-GP3, STS-GP4 and STS-HA1. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit <http://maps.dnr.state.wi.us/brrts>.

Please be aware that the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-303-5424.

Sincerely,

A handwritten signature in cursive script that reads "Casey L. Jones".

Casey L. Jones  
Hydrogeologist  
Remediation & Redevelopment Program

Electronic copy: Andrew Mott, STS Consultants  
Jennifer Borski, WDNR

012

This Indenture, Made this Seventh day of July in the year of our Lord One Thousand Eight Hundred and Eighty three between Gilbert C. Jones, Hannah J. Jones, Willard Jones of the Town of Wrenah, County of Mennebagg and State of Wisconsin

part is of the first part, and the CHICAGO AND NORTHWESTERN RAILWAY COMPANY, party of the second part, WITNESSETH, that the said party of the first part, for and in consideration of Twenty thousand and thirty five Dollars in hand paid by the said party of the second part, (the receipt whereof is hereby acknowledged, and the said party of the second part forever released and discharged therefrom,) has granted, bargained, sold, remised, released, aliened and confirmed, and by these presents do grant, bargain, sell, remise, release, alien and confirm, unto the said party of the second part, and to its successors and assigns forever, all the following described lot, piece or parcel of land, situated in the County of Mennebagg and State of

Wisconsin, a Strip of Land sixty six feet in width running across the East Half of the South West quarter of Section Twenty two in Town twenty North, Range seventeen East, extending in width twenty seven feet on the Easterly side and thirty nine feet on the Westerly side of the center line of a tract, located as commencing at a point on the North side of the channel of Fox River at low Water Mark, running thence on a curve to the West with a radius of Sixteen Hundred & thirty seven feet, nine Hundred and Eighty seven feet, thence North ten degrees & eleven Minutes West, seven Hundred & ninety five feet to a point on the North boundary line of said premises, five Hundred and seven feet West of the North East corner thereof, containing two & seventy hundredths acres more or less; Also two additional Strips of Land each seventy five feet in width adjoining & located one on the Easterly and the other on the Westerly side of the right of way above described and extending in length from the North line of said premises southerly to the North Shore of Fox River at low Water Mark, containing six & twenty one hundredths acres, reserving the right to build a canal along the margin of the River within one hundred fifty feet of low Water mark, preserving the tract of the road at all times in as good and perfect a shape as the same now is by means of proper bridges acceptable to the Engineer of said party of the second part,

bridge acceptable to the laymen of said party of the second part,

with all and singular the hereditaments and appurtenances thereto in any wise appertaining, and the reversion and reversions, remainder and remainders, rents, issues and profits thereof, and all the estate, right, title, interest, claim or demand whatsoever of the said party of the first part, either in law or equity, of, in and to the above bargained premises, with the hereditaments and appurtenances, TO HAVE AND TO HOLD the said premises above bargained and described, with the appurtenances, unto the said party of the second part, its successors and assigns FOREVER.

And the said Gilbert C. Jones & Willard Jones

parties of the first part, for Thurslan Thain heirs, executors and administrators, do covenant, grant, bargain and agree to and with the said party of the second part, its successors and assigns, that at the time of the enacting and delivery of these presents, ~~they are~~ well seized of the premises and lands aforesaid, and that the same are free and clear of all former and other grants, bargains, sales, liens, judgments, taxes, assessments and incumbrances of what kind and nature soever; and the above bargained premises, in the quiet and peaceable possession of the said party of the second part, its successors and assigns, against all and every person or persons lawfully claiming or to claim, the whole or any part thereof, the said parties of the first part shall and will WARRANT AND DEFEND.

IN WITNESS WHEREOF, the said parties of the first part have hereunto set their hands and seals the day and year first above written.

SIGNED, SEALED AND DELIVERED IN PRESENCE OF

L. C. Jones  
C. C. Townsend

u. S.  
Int. Rec.  
\$200  
Two Dollars  
223

Gilbert C. Jones [SEAL]  
Hannah Jones [SEAL]  
Willard Jones [SEAL]

STATE OF WISCONSIN,  
COUNTY OF WINNEBAGO.

On this 7<sup>th</sup> day of July, 1863, came personally before the subscriber, Gilbert C. Jones, Hannah Jones & Willard Jones to me well known to be the person described in, and who executed the above conveyance, and acknowledged that they had executed the same, and for the uses and purposes therein set forth.

Received for Record at 2 1/2 o'clock p.m.  
July 23: 1863

C. C. Townsend  
Justice of the Peace

Way across E 23<sup>rd</sup> St  
Price \$22-20-17  
also see last (COPY) adjoining piece

WARRANTY DEED.

Robert Groves

# 13 sheet 8 to Wis 1-13

also # 15 to April 14 20

Albert C Jones & others

-to-

The Chicago and Northwestern Railway Company.

REGISTER'S OFFICE,  
WINNEBAGO COUNTY, WIS.

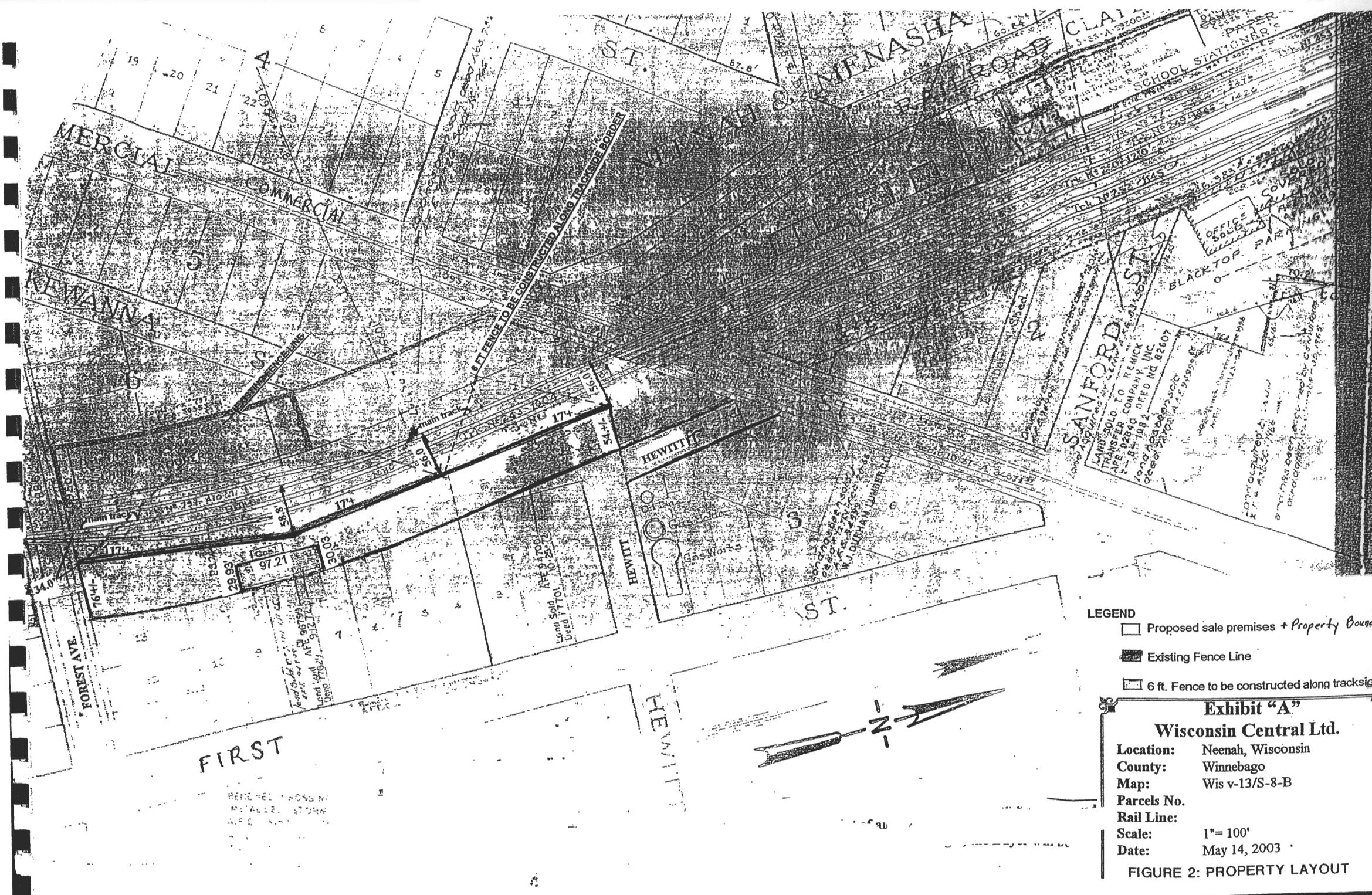
Recorded at 2 1/2 pm July 23<sup>rd</sup> 1863

in Vol. 82 on Page 79.

A. Merton  
Register.

I certify that the within is a true, full and correct copy  
of the original record in my office.

W. G. ...  
Register.



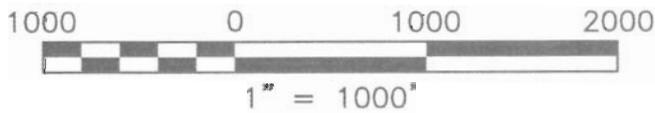
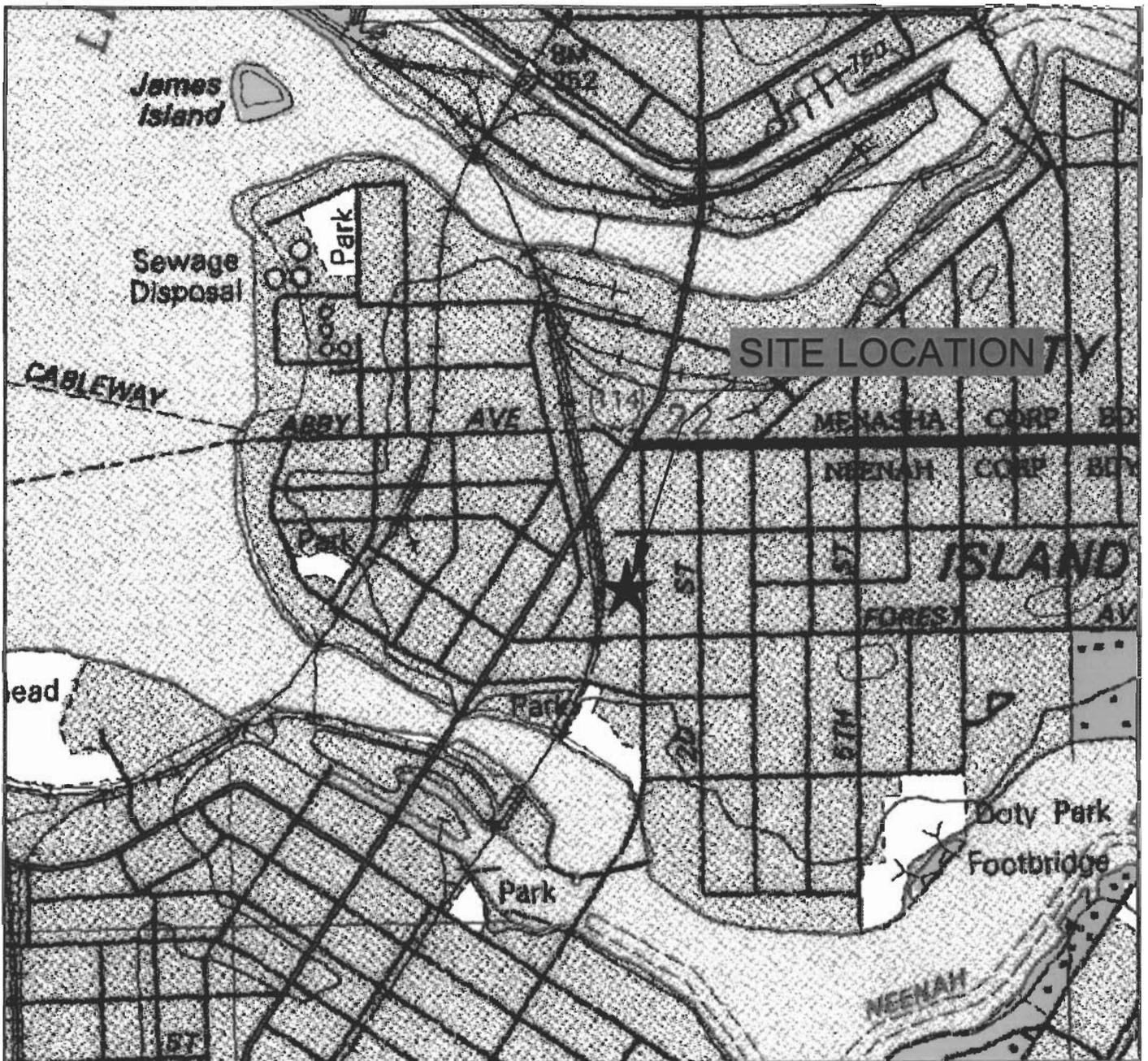
- LEGEND**
- Proposed sale premises + Property Boundary
  - Existing Fence Line
  - 6 ft. Fence to be constructed along trackside

**Exhibit "A"**

**Wisconsin Central Ltd.**

Location: Neenah, Wisconsin  
 County: Winnebago  
 Map: Wis v-13/S-8-B  
 Parcels No.  
 Rail Line:  
 Scale: 1" = 100'  
 Date: May 14, 2003

**FIGURE 2: PROPERTY LAYOUT**

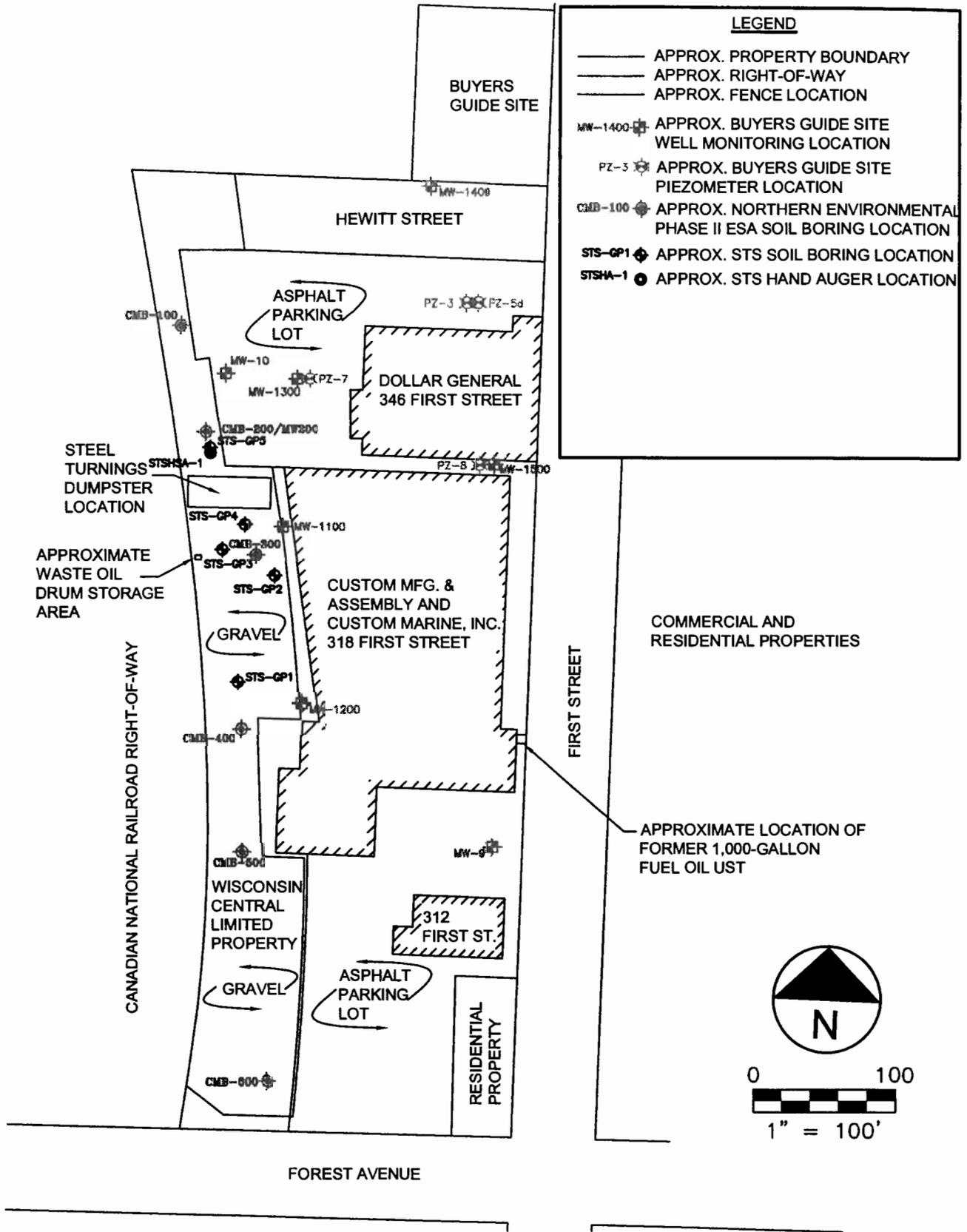


STS Consultants Ltd.  
 Consulting Engineers  
 558 North Main Street  
 Oakshoh, WI 54901  
 920.235.0270

**SITE LOCATION MAP  
 CONTRACT MANUFACTURING LEASE SITE  
 312 FIRST STREET  
 NEENAH, WISCONSIN**

DESIGNED BY	AGM	10/30/06
DRAWN BY	AGM	10/30/06
APPROVED BY		
CADFILE	SCALE AS SHOWN	
STS PROJECT NO.	FIGURE NO.	
200603521	1	

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**STS CONSULTANTS**  
 558 North Main Street  
 Oshkosh, WI 54901  
 920-235-0270  
 www.stsconsultants.com  
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**SITE DIAGRAM**  
**CONTRACT MANUFACTURING LEASE SITE**  
**312 FIRST STREET**  
**NEENAH, WISCONSIN**

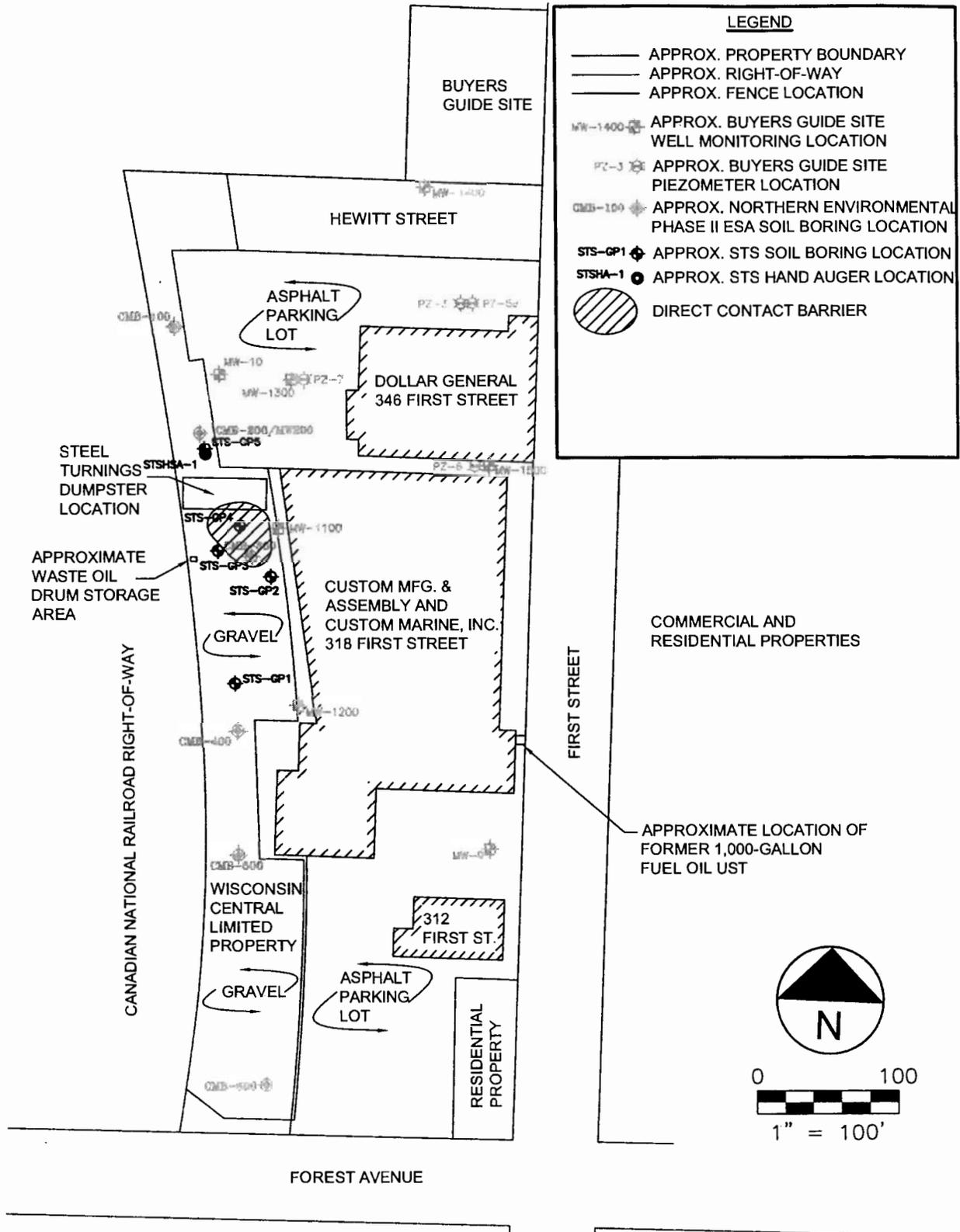
Drawn:	CSW 07/31/2006
Checked:	AGM 07/31/2006
Approved:	
PROJECT NUMBER	200603521
FIGURE NUMBER	2

Table 2  
Laboratory Analytical Results - Soil  
CN First Street Phase III  
STS Project 200603521

Sample Number Depth (Feet)	PID Date	*CMB-100 2.5 - 4.5 CLAY 4 6/6/2005	*CMB-200 2.5 - 4.5 CLAY 3 6/6/2005	*CMB-300 2.5 - 4.5 CLAY 1 6/8/2005	*CMB-400 2.5 - 4.5 CLAY 12 6/6/2005	*CMB-500 2.5 - 4.5 CLAY 4 6/6/2005	*CMB-600 2.5 - 4.5 CLAY 4 6/8/2005	0.0 - 1.0 FILL <1.0 7/17/06	STS-GP2 2.0 - 4.0 CLAY <1.0 7/17/06	4.0 - 6.0 CLAY <1.0 7/17/06	0.0 - 1.0 FILL <1.0 7/17/06	STS-GP3 2.0 - 4.0 CLAY <1.0 7/17/06	4.0 - 6.0 CLAY <1.0 7/17/06	0.0 - 1.0 FILL <1.0 7/17/06	STS-GP4 2.0 - 4.0 CLAY 20 7/17/06	4.0 - 6.0 CLAY 80 7/17/06	STS-HA1 0.5 - 1.0 FILL <1.0 10/5/06	Suggested Generic 2.0 - 4.0 Guidance Values Direct Contact Non-Industrial RCLs (ug/kg)	Suggested Generic 4.0 - 6.0 Guidance Values Direct Contact Industrial RCLs (ug/kg)	Suggested Generic WDR Interim Guidance Values Groundwater Pathway RCLs (ug/kg)
		Units																		
<b>PAHs</b>																				
Acenaphthene	ug/kg	<41	<41	44 J	<41	<41	<41	<3.1	<3.8	<3.8	4.8	<3.8	<3.8	56	7.3	<3.9	10	900,000	60,000,000	38,000
Acenaphthylene	ug/kg	<42	<42	165	<42	<42	<42	6.4	<3.7	<3.7	11	<3.7	<3.7	520	<3.7	<3.7	8.9	18,000	360,000	700
Anthracene	ug/kg	47 J	<34	320	<34	40 J	63 J	13	<4.6	<4.6	23	<4.5	<4.5	750	<4.5	<4.6	42	5,000,000	300,000,000	3,000,000
Benzo(a)anthracene	ug/kg	76 J	<34	947	<54	40 J	63 J	32	<6.8	<6.8	60	<6.7	<6.8	2,400	<6.8	<6.9	190	88	39,000	17,000
Benzo(a)pyrene	ug/kg	89 J	<59	957	<59	77 J	271	33	<3.7	<3.7	59	<3.7	<3.7	2,100	<3.7	<3.7	310	8.8	390	48,000
Benzo(b)fluoranthene	ug/kg	87 J	<42	1,580	<42	140	388	36	<3.6	<3.6	61	<3.6	<3.6	2,300	<3.6	<3.7	340	88	3,900	360,000
Benzo(ghi)perylene	ug/kg	<79	<79	545	<79	152 J	144 J	28	<4.6	<4.6	34	<4.5	<4.5	1,200	<4.5	<4.6	130	1,800	39,000	6,800,000
Benzo(k)fluoranthene	ug/kg	<82	<82	236 J	<82	<82	92 J	30	<3.9	<3.9	55	<3.9	<3.9	1,800	<3.9	<4.0	310	880	39,000	870,000
Chrysene	ug/kg	73 J	<38	933	<38	79 J	262	43	<5.6	<5.6	82	<5.5	<5.6	2,400	<5.6	<5.7	250	8,800	390,000	37,000
Dibenzo(ah)anthracene	ug/kg	<76	<76	<76	<76	<76	<76	7.2	<3.5	<3.5	11	<3.5	<3.5	470	<3.5	<3.6	47	8.8	390	38,000
Fluoranthene	ug/kg	203	<42	1490	<42	197	492	63	<3.7	<3.7	130	<3.7	<3.7	4,600	<3.7	6.5	550	600,000	40,000,000	500,000
Fluorene	ug/kg	<41	<41	54 J	<41	<41	<41	<3.6	<4.4	<4.4	6	<4.3	<4.4	94	<4.4	<4.4	12	600,000	40,000,000	100,000
Indeno(1,2,3-cd)pyrene	ug/kg	<69	<69	179 J	<69	<69	95 J	22	<3.2	<3.2	30	<3.2	<3.2	1,100	<3.2	<3.3	130	88	3,900	680,000
1-Methylnaphthalene	ug/kg	<37	<37	362	<37	<37	114 J	30	5.8	<3.9	61	6.7	<3.9	150	5.9	5.3	17	1,100,000	70,000,000	23,000
2-Methylnaphthalene	ug/kg	<72	<72	426	<72	<72	144 J	36	11	<4.0	78	11	<4.0	200	6.4	9.9	21	600,000	40,000,000	20,000
Naphthalene	ug/kg	<40	<40	176	<40	<40	63 J	18	<5.2	<5.1	38	<5.1	<5.1	190	<5.1	11	13	20,000	110,000	400
Phenanthrene	ug/kg	154	<20	1060	<20	107	240	85	<3.8	<3.8	160	<3.7	<3.8	1,500	5.0	7.9	230	18,000	390,000	1,800
Pyrene	ug/kg	140 J	<58	1290	<58	140 J	364	55	<3.2	<3.1	110	<3.1	<3.1	3,300	<3.1	5.3	430	500,000	30,000,000	500,000
<b>RCRA METALS (Totals)</b>																				
																		NR720 Non-Industrial Direct Contact Values	NR720 Industrial Direct Contact Values	
Arsenic	mg/kg	<0.015	<0.015	1.3	<0.015	<0.015	<0.015	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	0.039	1.6	
Barium	mg/kg	140	180	68	160	120	120	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	NE	
Cadmium	mg/kg	0.56	0.82	2.8	0.64	0.64	0.63	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	8.0	510	
Chromium	mg/kg	40	52	9.7	43	38	38	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	NE	
Lead	mg/kg	11	17	110	12	11	10	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	50	500	
Mercury	mg/kg	0.042	0.026	0.12	0.026	0.013 J	0.016 J	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	NE	
Selenium	mg/kg	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	NE	
Silver	mg/kg	<0.0037	0.81	2.0 J	<0.0037	<0.0037	<0.0037	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	NE	
<b>VOCs</b>																				
																		NR720 Groundwater Pathway Values RCLs	NR 746 Table 1 Values	NR 746 Table 2 Values
Benzene	ug/kg	<25	<25	<25	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	5.5	8,500	1,100
Ethyl benzene	ug/kg	<25	<25	<25	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	2,900	4,600	NE
Methyl-tert-butyl-ether	ug/kg	<25	<25	<25	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	NE	NE
Naphthalene	ug/kg	<25	<25	76	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	2,700	NE
Toluene	ug/kg	<25	<25	42	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	1,500	38,000	NE
1,2,4 Trimethylbenzene	ug/kg	<25	<25	59	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	83,000	NE
1,3,5 Trimethylbenzene	ug/kg	<25	<25	27	<25	<25	<25	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NE	11,000	NE
Total Xylene	ug/kg	<75	<75	117	<75	<75	<75	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	4,100	42,000	NE

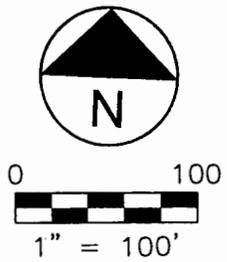
Notes:  
ug/kg - Micrograms per kilograms  
J - analyte detected between the Limit of Detection and the Limit of Quantitation  
88 - Exceeded Non-Industrial Direct Contact RCLs  
88 - Exceeds Industrial Direct Contact RCLs (bold)  
88 - Exceeds Groundwater Pathway RCLs (boxed)  
\* - Northern Environmental Borings  
PVOC - Petroleum Volatile Organic Compound  
NE - Not Established by Wisconsin Administrative code (Wis. Adm. Code)  
RCRA - Res Cadmium Totals Not Established by Wis. Adm. Code  
NS - Not Sampled

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**LEGEND**

- APPROX. PROPERTY BOUNDARY
- APPROX. RIGHT-OF-WAY
- APPROX. FENCE LOCATION
- MW-1400 APPROX. BUYERS GUIDE SITE WELL MONITORING LOCATION
- PZ-3 APPROX. BUYERS GUIDE SITE PIEZOMETER LOCATION
- CMB-100 APPROX. NORTHERN ENVIRONMENTAL PHASE II ESA SOIL BORING LOCATION
- STS-GP1 APPROX. STS SOIL BORING LOCATION
- STSHA-1 APPROX. STS HAND AUGER LOCATION
- DIRECT CONTACT BARRIER



**STS CONSULTANTS**  
 558 North Main Street  
 Oshkosh, WI 54901  
 920-235-0270  
 www.stsconsultants.com  
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**DIRECT CONTACT BARRIER LOCATION  
 CONTRACT MANUFACTURING LEASE SITE  
 312 FIRST STREET  
 NEENAH, WISCONSIN**

Drawn :	CSW 07/31/2006
Checked:	AGM 07/31/2006
Approved:	DRL 5/22/2007
PROJECT NUMBER	200603521
FIGURE NUMBER	1

## STATEMENT OF PROPERTY LEGAL DESCRIPTION

As required by s.NR 726.05(3) of the Wisconsin Administrative Code, I am providing this signed statement that, to the best of my knowledge, the legal description shown is complete and accurate for the Wisconsin Central, Ltd. - Contract Manufacturing Lease Site located in the City of Neenah, Winnebago County, Wisconsin.



(Signature) Kurt Blumer

Title: Environmental Coordinator

Date: 20 Nov 2006